

While increasing national standards for commercial sightseeing flights might be necessary, I believe there is no data supporting the claim that increasing such standards is necessary for pilots operating charity airlift flights under Part 61.113(d).

I routinely participate in such airlifts, donating my operating expense so that 100% of ticket sales revenue can go to the charity. Many pilots based at my airport do the same. Together we have raised thousands of dollars for medical care for local children, funding for Mission Aviation Fellowship (www.maf.org), and support of the local Humane Society.

Safety of charity airlifts is certainly important. I believe the FAA already adequately addresses charitable airlift safety. The FAA already requires that an aircraft participating in charity airlifts meet 100-hour inspection requirements, and that the flight be conducted during day VFR conditions, and that the pilot in command have accrued 200 hours of PIC time. How much additional margin will those extra 300 hours buy? Is it worth it compared to the number of pilots who will be shut out of the program? I think not. Further, do you have accident data showing that charitable airlift flights are experiencing safety problems? Again, I think not.

Please reconsider this NPRM and remove any language or text that tightens requirements as regards charity airlifts.

Thank you.